

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF OHIO  
WESTERN DIVISION

In re:

Case No. 06-32675

Thomas M. Trapp,  
Jennifer C. Trapp,

Chapter 13  
Judge Humphrey

Debtors.

**OBJECTION TO MOTION FOR STAY RELIEF**

Now come the debtors, through counsel, and object to the Motion for Stay Relief filed herein on April 21, 2010, by JP Morgan Chase Bank, for the reason that debtors now have all money necessary to completely catch up their mortgage and are sending it to the creditor/movant forthwith and will keep all payments on time in the future.

Debtors respectfully prays that the motion be denied.

Respectfully submitted,

/s/ Michael J. Ellerbrock  
Michael J. Ellerbrock (0023289)  
Attorney for Debtor  
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**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing objection has been sent to Jeffrey M. Kellner, Chapter 13 Trustee, and to the Office of the U S Trustee (by electronic filing); to Erin A. Jochim, Attorney for Creditor, P O Box 5480, Cincinnati, Ohio 45201-5480; and to the debtors, Mr. & Mrs. Thomas Trapp, 2564 Acorn Drive, Dayton, Ohio 45419 on date filing by ordinary U S Mail.

/s/ Michael J. Ellerbrock  
Michael J. Ellerbrock (0023289)  
Attorney for Debtor